

UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. 16-MJ-601 HB

DANIEL GEORGE FISHER

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

On or about September 30, 2015, in Hennepin County, in the State and District of Minnesota, defendant Daniel George Fisher, did intentionally obstruct and attempt to obstruct, members of the Tawfiq Islamic Center in the enjoyment of the members' free exercise of their religious beliefs by threat of force, including by the threatened use of a dangerous weapon, explosives, and fire, in violation of Title 18, United States Code, Sections 247(a)(2) and (d)(3).

I further state that I am a Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT OF KEVIN M. KANE

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



Complainant's signature

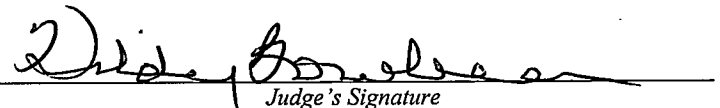
Kevin M. Kane, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

8/31/16

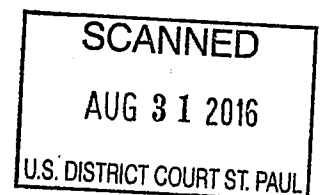


Judge's Signature

City and State: St. Paul, MN

Hildy Bowbeer, U.S. Magistrate Judge

Printed Name and Title



STATE OF MINNESOTA)
)
COUNTY OF RAMSEY)

16-MJ-601 HB

ss. AFFIDAVIT OF KEVIN M. KANE

I, KEVIN M. KANE, being duly sworn, depose and state as follows:

INTRODUCTION

1. I am a Special Agent of the Federal Bureau of Investigation ("FBI") and have been so employed in this capacity since March 2009. I am currently assigned to Minneapolis Field Office (MP) and have been since June 2016. Prior to my transfer to Minneapolis, I was assigned to the Detroit Field Office (DE) for approximately six years. As a Special Agent of the FBI, my duties and responsibilities include the investigation of Federal Civil Rights violations, including Hate Crimes, amongst other violations of Federal laws, including those laws found in Title 18 and Title 21 of the United States Code. Over the course of my employment with the FBI, I have investigated numerous civil rights matters, specifically investigations involving hate crimes. I have also gained experience through training at the FBI Academy, in-service training, and everyday work relating to conducting these types of investigations.

2. This Affidavit is submitted in support of a criminal complaint charging Daniel George Fisher, with Obstruction of Persons in the Free Exercise of Religious Beliefs, in violation of Title 18 U.S.C. § 247(a)(2) and (d)(3).

3. The facts and information contained in this Affidavit are based upon my own investigation and observations of other agents and law enforcement officers involved in the investigation. This Affidavit contains information necessary to support

probable cause for the attached Complaint. It is not intended to include each and every fact and matter observed by me or known to the Government.

PROBABLE CAUSE

4. On or about September 30, 2015, the Tawfiq Islamic Center received an anonymous handwritten letter, which threatened to “blow up your building with all you immigrants in it.” The letter also included profanities, racial and ethnic slurs, and other derogatory commentary about the religious and cultural practices of the members of the Tawfiq Islamic Center.

5. The Tawfiq Islamic Center is a non-profit organization that was established to serve the Oromo Muslim community in Minnesota. The Tawfiq Islamic Center provides religious services and serves as a gathering and worship place for members of the community. As part of its expansion plan, the Tawfiq Islamic Center purchased a building located at 2400 Minnehaha Avenue in Minneapolis, Minnesota.

6. The threat letter was sent via the U.S. mail to the building located at 2400 Minnehaha Avenue. The letter was not signed and included a false return address. Upon receiving the threat letter, members of the Tawfiq Islamic Center felt threatened by the letter and feared for the safety of the Center and those that gathered and attended religious services at the Center. The Tawfiq Islamic Center reported the threat to law enforcement.

7. The FBI’s Latent Prints Operations Unit conducted an examination of the threat letter, envelope, and stamp. The examination revealed two sets of finger prints on the threat letter. One set belonged to a member of the Tawfiq Islamic Center, who

initially reported to law enforcement that he touched the letter with his bare hands when the Center received the threat letter. The second set of finger prints belonged to Daniel George Fisher.

8. Further investigation determined that Daniel George Fisher lived in an apartment building that was less than three blocks away (.2 miles) from the Tawfiq Islamic Center (2400 Minnehaha Avenue South) at the time the letter was received. The investigation also determined that Daniel George Fisher no longer lives in that apartment building and is homeless with no known address.

9. FBI Special Agents interviewed Daniel George Fisher on June 14, 2016. The Special Agents showed Daniel George Fisher a copy of the threat letter and he confessed to writing and mailing it to the Tawfiq Islamic Center. Daniel George Fisher reported that he was angry that the Tawfiq Islamic Center selected Minnehaha Avenue for its new location and he wanted the Center to build somewhere else. Daniel George Fisher further reported that he had become "increasingly angry with Muslims since 9/11."

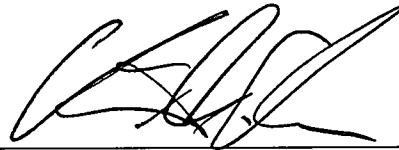
10. Daniel George Fisher confessed that he sent the letter with the intent to threaten and scare members of the Tawfiq Islamic Center so that they would stop construction of the new building on Minnehaha Avenue. In a written confession, Daniel George Fisher stated that he "thought the letter would make the [C]enter relocate." Daniel George Fisher admitted that a person who read the letter would feel threatened and fear for their safety because of the threats in his letter.

11. Daniel George Fisher confessed that he did not sign the letter because he wanted the Tawfiq Islamic Center to believe it was "anyone in the area" making the

threats. He admitted that he used a false return address on the envelope so that the letter could not be traced to him.

12. Based on the above stated facts, your Affiant believes probable cause exists that Daniel George Fisher obstructed and attempted to obstruct members of the Tawfiq Islamic Center in the enjoyment of the members' free exercise of their religious beliefs by threat of force, including by the threatened use of a dangerous weapon, explosives, and fire, in violation Title 18 U.S.C. § 247(a)(2) and (d)(3).

Further your Affiant sayeth not.



Kevin M. Kane
Special Agent
Federal Bureau of Investigation

Sworn and subscribed to before me

this ²⁵ 31 day of August 2016.



The Honorable Hildy Bowbeer
UNITED STATES MAGISTRATE JUDGE